

REMARKS

1. Applicant thanks the Examiner for his findings and conclusions.
2. It should be appreciated that Applicant has elected to amend Claims 1, 8, 16, 29, 36, 44, 49, 56, 63, 71, 85, and 86 and to cancel Claims 7, 35, 50, and 62 solely for the purpose of expediting the patent process in a manner consistent with the PTO's Patent Business Goals, 65 Fed. Reg. 54603 (9/8/00). In making such amendments, Applicant has not and does not in any way narrow the scope of protection to which the Applicant considers the invention herein entitled. Rather, Applicant reserves Applicant's right to pursue such protection at a later point in time and merely seeks to pursue protection for the subject matter presented in this submission.

Hilton Davis / Festo Statement

The amendments herein to Claims 8, 16, 29, 36, 44, 49, 56, 63, 71, 85, and 86 were not made for any reason related to patentability. Claims 29, 56, 85, and 86 were amended to clarify the invention. Claims 8, 16, 36, 44, 49, 63, and 71 were amended to conform with standard claim drafting practices. All of the above listed amendments were made for reasons other than patentability.

3. Claims 29, 31, 33, 35-56, 58, 60, 62-81, and 86 stand rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement.

Claims 29 and 56

The Examiner states, emphasis in the original, that: "said **ideographic database** containing a set of **phonetic sequences** whose spellings correspond

to said input sequence and a set of **stroke sequences** corresponding to the input sequence" introduces new subject matter not disclosed in the original specification. The Applicant amends Claim 29 to clarify the invention by requiring that the ideographic database contains all of:

a set of ideographic character sequences;

an ideographic index for each element of said set of ideographic character sequences;

a plurality of stroke indices corresponding to said set of stroke sequences; and

a plurality of phonetic indices corresponding to said set of phonetic sequence.

Support for the amendment is found in the application as filed at least at page 8, line 20 to page 9, line 3 reading in part, emphasis added:

The user input device includes: (1) a plurality of input means, each of which being associated with a plurality of strokes or phonetic characters, an input sequence being generated each time when an input is selected by the user input device; (2) data consisting of a plurality of input sequences and, associated with each input sequence, an input method specific database containing a plurality of input sequences and, associated with each input sequence, a set of phonetic sequences whose spellings correspond to the input sequence or a set of strokes sequences corresponding to the input sequence; and (3) an ideographic database containing a set of ideographic character sequences, wherein each ideographic character contains an ideographic index, a plurality of stroke indices to corresponding stroke sequences and a plurality of phonetic indices to corresponding phonetic sequences.

Further, the Applicant amends Claim 29 to remove the prior description of the ideographic database. Claim 56 is similarly amended. Accordingly, the current rejection of Claims 29 and 56 and all claims dependent therefrom under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement is deemed to be overcome.

Claim 86

Regarding Claim 86, the Examiner states, emphasis in the original: "said linguistic model causes said step of displaying to display a predicted word **prior** entry of **any** of said input sequence for said predicted word" introduces new subject matter. The Applicant amends Claim 86 to clarify the invention by requiring that the linguistic model causes the step of displaying to display a predicted word before the user types any characters of the input sequence for the predicted word. Support for the amendment is found in the application as filed at least at page 21, lines 12-15 reading, emphasis added:

In another preferred embodiment, the system may provide the user with word predictions based on the words syllables entered so far and a linguistic model. The linguistic model may be used to determine in which order the predictions should be presented to the user. In fact the linguistic model can provide the user with predictions of words even before the user types any characters.

Accordingly, the current rejection of Claims 86 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement is deemed to be overcome.

4. Claims 29, 31, 33, 35-56, 58, 60, and 62-81 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter that the Applicant regards as the invention.

In view of the above described amendments to parent Claims 29 and 56, the current rejection of Claims 29, 31, 33, 35-56, 58, 60, and 62-81 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter that the Applicant regards as the invention is rendered moot.

5. Claims 3, 16, 18-20, 31, 44, 45, 48-50, 58, 71, and 73-75 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Williams in view of U.S. patent no. 6,822,585 (hereinafter "Ni").

While the Examiner rejects Claims 3, 16, 18-20, 31, 44, 45, 48-50, 58, 71, and 73-75 herein, the Examiner additionally comments on Claims 1, 4, 5, 7-15, 21-25, 33-43, 51-53, 56, 60, 62-70, 76-80, 83, 84, and 86. The Applicant deems the record unclear as it is not clear if any of Claims 1, 4, 5, 7-15, 21-25, 33-43, 51-53, 56, 60, 62-70, 76-80, 83, 84, and 86 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Williams in view of Ni. However, in a manner consistent with the PTO's Patent Business Goals, 65 Fed. Reg. 54603 (9/8/00), the Applicant addresses herein the Examiner's comments for each of Claims 1, 4, 5, 7-15, 21-25, 33-43, 51-53, 56, 60, 62-70, 76-80, 83, 84 as well as currently rejected Claims 3, 16, 18-20, 31, 44, 45, 48-50, 58, 71, and 73-75.

Claim 1

The Applicant amends Claim 1 to overcome the cited art and to further clarify the invention by further requiring Claim 1 to have a step of: prioritizing stroke or phonetic sequences that match an input sequence and prioritizing ideographic character sequences that match a stroke or phonetic sequence according to a linguistic model, wherein the model comprises a semantic model. Support for the amendment is found in the application as filed at least within original Claim 7 and at page 21, lines 26-27. A semantic model pertains to or arises from the different meanings of words. Williams and Ni do not combine to teach or describe a semantic model in the context of a method for receiving input sequences entered by a user and generating a phrase comprising one or more ideographic characters as an output. Accordingly, even if Claim 1 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Williams in view Ni, the rejection would be overcome.

Claim 36

As to Claim 36, the Applicant respectfully disagrees. Claim 36 requires that the linguistic model uses application context of the current input sequence entry. The Examiner cites Williams at paragraph [0059] as having the phrase "subsequent strokes", which the Applicant finds at line 12 of paragraph [0059]. The Examiner states without citation: "'subsequent strokes' that is 'based on the occurrence frequency of characters ... in everyday language usage (interpreted as use of application context of current sequence entry)'" First, this is not a sentence. Second, the Examiner without citation interprets the phrase "subsequent strokes" as being apparently a subsequent stroke prediction based upon frequency of occurrence in everyday language. The Examiner is requested to clarify how this connection is made. Even if the connection is made, the Examiner interprets broadly that frequency of use equates to application context. However, in stark contrast, Claim 36 requires a linguistic model. A linguistic model reaches far beyond frequency of occurrence of a character in the language. Further, Claim 36 requires that the linguistic model uses application context of the input sequence. The Applicant cannot understand how the Examiner connects frequency of use (not supported in the rejection) with application context. Respectfully, even Williams teaching of "subsequent strokes" is not even remotely connected with a linguistic model's use of application context. As noted, *supra*, Claim 36 is not rejected. However, even if Claim 36 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Williams in view of Ni, the rejection would be deemed improper.

Claim 50

As to Claim 50, the Applicant respectfully disagrees. The Examiner's entire rejection reads:

- As per **claim 51** (depending on claim 29), the rejection is based on the same reason described for claim 36, because the claim recites the same or similar limitation(s) as claim 36.

As noted, *supra*, the rejection of Claim 36 is deemed to be improper. Further, the Examiner's logic for rejection of Claim 36 is at best tangentially connected to the Claim 36 requirement of: "wherein said linguistic model comprises use of application context of current input sequence entry". The Applicant notes that Claim 50 has distinct requirements from that of Claim 36. Specifically, Claim 50 requires that the linguistic model comprises use of grammar of the surrounding sentence. Under MPEP 706 it is stated that "the goal of examination is to clearly articulate any rejection early in the prosecution process so that the applicant has the opportunity to provide evidence of patentability and otherwise reply completely at the earliest opportunity." The Examiner is requested to explain his rejections citing particular art teaching use of a linguistic model used in the context of the system for receiving input sequences entered by a user and generating a phrase comprising one or more ideographic characters as an output, where the model uses grammar of the surrounding sentence. This request is respectfully made so that the Applicant can respond to the rejections in order to further the patent prosecution of the pending application. However, in view of the improper rejection of Claim 36 and no additional citation or explanation of the distinct Claim 50 requirement that the linguistic model comprises use of grammar of the surrounding sentence, the current rejection of Claim 50 under 35 U.S.C. § 103(a) as being unpatentable over Williams in view of Ni is deemed to be improper. Claim 50 is amended into Claim 29 as described, *infra*.

Claim 29

The Applicant amends Claim 29 to overcome the cited art and to further clarify the invention by further requiring Claim 1 to have a step of: prioritizing stroke or phonetic sequences that match an input sequence and prioritizing ideographic

character sequences that match a stroke or phonetic sequence according to a linguistic model, the linguistic model further comprising use of grammar of the surrounding sentence. Support for the amendment is found in the application as filed at least within original Claim 50. Williams and Ni do not combine to teach or describe a linguistic model comprising use of grammar of the surrounding sentence in the context of a method for receiving input sequences entered by a user and generating a phrase comprising one or more ideographic characters as an output. Accordingly, even if Claim 29 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Williams in view Ni, the rejection would be overcome.

Claim 56

The Applicant amends Claim 56 to overcome the cited art and to further clarify the invention by further requiring Claim 56 to have a step of: prioritizing stroke or phonetic sequences that match an input sequence and prioritizing ideographic character sequences that match a stroke or phonetic sequence according to a linguistic model, said linguistic model extended to contain phrases not contained in either said ideographic database. Support for the amendment is found in the application as filed at least within original Claim 7; at page 15, line 29; and at page 15, line 33 to page 16, line 2. Williams and Ni do not combine to teach or describe a linguistic model extended to contain phrases not contained in either said ideographic database in the context of a method for receiving input sequences entered by a user and generating a phrase comprising one or more ideographic characters as an output. Accordingly, even if Claim 56 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Williams in view Ni, the rejection would be overcome.

Claim 84

As to Claim 84, the Applicant respectfully disagrees. The Examiner cites Williams at paragraphs [0052] and [0062]. Williams at paragraph [0052] teaches

input buffers and candidates. Paragraph [0062] of Williams goes on to describe the buffers as Latin letters and the candidates as being an intended Chinese character. Particularly, Williams at paragraph [0062], lines 3-12 reads, emphasis added:

Language module **104** receives ... a group of **two** or more Latin letters and returns a number of candidate characters in the Chinese language. ... When the intended Chinese character is finally selected, the process can be repeated for subsequent Chinese characters of the intended message.

Hence, Williams teaches prior to a Latin input sequence being completed, presenting the user with a single candidate Chinese character. In stark contrast, Claim 84 requires: "prior to said input sequence completing a first Chinese character, said step of displaying displays a corresponding Chinese phrase having two or more Chinese characters". Williams does teach repeating a process, but does not teach an input sequence leading to a display of a Chinese phrase, where the phrase has two or more Chinese characters. Nothing in Williams teaches or suggests displaying a Chinese phrase having two or more Chinese characters based on a partial input sequence of a first Chinese character. Accordingly, even if Claim 84 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Williams in view of Ni, the rejection would be improper.

Claim 86

The Examiner rejects Claim 86 as best understood in view of the above described 35 U.S.C. § 112, first paragraph, rejection for the same reasons described for the rejection of Claim 48. As amended, *supra*, the Claim 86 requirements are distinct from the Claim 48 requirements. Particularly, Claim 86 requires that the linguistic model causes the step of displaying to display a predicted word before the user types any characters of the input sequence for the predicted word. Even if the Examiner meant to reject Claim 86 in view of Williams and Ni, Williams and Ni do not combine to teach or describe Claim 86

as amended. Accordingly, any rejection of Claim 86 under 35 U.S.C. § 103(a) as being unpatentable over Williams in view of Ni would have been overcome.

6. The Applicant cancels Claims 7, 35, 50, and 62 from the application.
7. As a result of cancellation of Claims 7 and 62, the Applicant amends dependencies of Claims 8, 16, 36, 44, 63, and 71 according to standard claim drafting practices.
8. As a result of amendments to parent Claim 29, the Applicant amends Claim 49 to use proper descendent language according to standard claim drafting practices.
9. Claims 27, 46, 54, and 55 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Williams in view of Ni (as applied to Claims 1, 29, and 56), in further view of U.S. patent no. 5,197,810 (hereinafter "Zhang").

In view of the above described amendments to parent Claims 1 and 29, the current rejection of dependent Claims 27, 46, 54, and 55 under 35 U.S.C. § 103(a) as being unpatentable over Williams in view of Ni in further view of Zhang is rendered moot.

10. Claims 17, 47, and 72 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Williams in view of Ni (as applied to Claims 1, 29, and 56) in further view of U.S. patent application publication no. US 2003/0017858 A1 (hereinafter "Kraft").

In view of the above described amendments to parent Claims 1, 29, and 56, the current rejection of dependent Claims 17, 47, and 72 under 35 U.S.C. § 103(a) as being unpatentable over Williams in view of Ni in further view of Kraft is rendered moot.

11. Claim 85 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Williams in view of Ni (as applied to Claims 1, 29, and 56) in further view of U.S. patent no. 6,073,146 (hereinafter "Chen").

In view of the above described amendments to parent Claim 1, the current rejection of dependent Claim 85 under 35 U.S.C. § 103(a) as being unpatentable over Williams in view of Ni in further view of Chen is rendered moot.

The Applicant amends Claim 85 to still further distinguish Claim 85 from the cited art by further requiring steps of (1) providing the user with spelling variations based on both said input sequence and confusion sets; and (2) providing an option for the user to turn off a particular confusion set of the confusion sets. Support for the amendment is found in the application as filed at least at page 20, lines 9-19 and in Table 5. William, Ni, and Chen do not teach or described either of the two above described steps. Accordingly, the current rejection of Claim 85 under 35 U.S.C. § 103(a) as being unpatentable over Williams in view of Ni in further view of Chen is deemed to be overcome.

12. Claim 87 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Williams in view of Ni (as applied to Claims 1, 29, and 56) in further view of U.S. patent publication no. US 2007/0106492 (hereinafter "Kim").

In view of the above described amendments to parent Claim 1, the current rejection of dependent Claim 87 under 35 U.S.C. § 103(a) as being unpatentable over Williams in view of Ni in further view of Kim is rendered moot.

CONCLUSION

In view of the foregoing, the Application is deemed to be in allowable condition. As such, the Examiner is earnestly requested to withdraw all rejections, allowing the Application to pass to issue as a U.S. patent. Should the Examiner have any questions regarding the Application, he is respectfully urged to contact the Applicant's attorney, Michael Glenn, at (650) 474-8400.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "E. Ruzich".

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